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July 6, 2022

Via ECF

The Honorable Gabriel W. Gorenstein
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: *Schansman et al v. Sberbank of Russia PJSC et al.*, 19-cv-02985-ALC-GWG
Response to Plaintiffs' Letter Requesting an Extension of the Discovery
Schedule (ECF No. 376)**

Dear Judge Gorenstein:

Pursuant to paragraph 2.A of Your Honor's Individual Practices and Order dated July 1, 2022 (ECF No. 378), MoneyGram International, Inc. and MoneyGram Payment Systems, Inc. (collectively "MoneyGram") write in response to Plaintiffs' Request to Extend the Discovery Schedule (ECF No. 376). MoneyGram respectfully opposes Plaintiffs' request to extend the discovery schedule for all parties by six months. Based on yesterday's discovery conference and the uncertain status of the other two defendants, it remains unclear how much discovery actually remains outstanding. MoneyGram recognizes that some extension of the substantial completion deadline will be required in light of yesterday's conference, but it is premature to say how long that extension should be, or how other deadlines should be adjusted, prior to receiving the additional information that the Court has ordered Plaintiffs to provide, ascertaining the production burden on MoneyGram, and knowing whether the other two defendants will be defaulted in the next few days. *See* ECF Nos. 373, 374. In light of the substantial costs already incurred by MoneyGram in this now three-year-old case, and the lack of any indication to date that Plaintiffs will be able to identify any other relevant individuals who received a transfer via MoneyGram prior to the MH17 crash, MoneyGram cannot consent to a blanket six-month extension of all deadlines.

We appreciate that the parties would like to address at least the upcoming substantial completion deadline, which is currently scheduled for July 19, 2022. To that end, MoneyGram proposes that that deadline be extended to September 19, 2022, without prejudice to the parties seeking a further enlargement of this deadline, or the other deadlines in the discovery schedule, at a later date.

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We appreciate the Court's consideration of this proposal.

Respectfully submitted,

/s/ Christopher N. Manning
Christopher N. Manning

Counsel for the MoneyGram Defendants

cc: Counsel of Record (via ECF)